

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD ZEITLIN,

Defendant.

23 Cr. 419 (LAK)

**DECLARATION OF ROBERT G. BERNHOFT**

I, Robert G. Bernhoft, hereby declare under penalty of perjury that:

1. I represent Richard Zeitlin in this matter, and hereby execute this Declaration in support of Defendant's Motion to Suppress Evidence Seized Under Search Warrants for a Residence and Office in the District of Nevada.

2. Except as explicitly to the contrary, I have personal knowledge of the facts set forth in the Declaration and if called upon to testify could do so competently.

3. Exhibit A is a true and correct copy of the Indictment in this case, filed as Doc. 1.

4. Exhibit B is a true and correct copy of the Warrant Application, Supporting Affidavit and the Warrant issued authorizing the search of 1835 East Charleston Boulevard, Las Vegas, Nevada 89104. This document is filed under seal.

5. Exhibit C is a true and correct copy of the Warrant Application, Supporting Affidavit and the Warrant issued authorizing the search of 7815 W. La Madre Way, Las Vegas, Nevada 89149. This document is filed under seal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury the foregoing is true and correct to the best of my information, knowledge, and belief.

Dated: November 30, 2023.  
Austin, Texas

**THE BERNHOFT LAW FIRM, S.C.**  
Attorneys for Defendant Richard Zeitlin



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